

# **EXHIBIT B**

THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

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CHAO CHEN, individually and	)	
on behalf of all those	)	No. 3:17-cv-05769-RJB
similarly situated,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
THE GEO GROUP, INC., a	)	
Florida corporation,	)	
	)	
Defendant.	)	

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VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF  
**NWAUZOR UGOCHUKWU**  
June 19, 2018  
Fircrest, Washington

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Taken Before:

Laura A. Gjuka, CCR #2057  
Certified Shorthand Reporter

A P P E A R A N C E S

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1 my language. what I'm doing, like, learning. It's not  
2 my language.

3 Q Okay.

4 A Yeah.

5 Q So you got into the United States -- you waited in a  
6 long line, you got into the United States and you  
7 requested asylum, correct?

8 A Yeah.

9 Q Okay. Do you understand that the Department of Homeland  
10 Security had to check you out to make sure you were not  
11 a threat to the United States, correct?

12 A I believe.

13 Q Okay. And so while you were seeking asylum, they put  
14 you in a detention center, correct?

15 A Yes.

16 Q You were in the custody of Department of Homeland  
17 Security, right? ICE, Immigration and Customs  
18 Enforcement, correct?

19 A Yeah.

20 Q Okay. And they placed you at Northwest Detention  
21 Center, correct?

22 A Yes, sir.

23 Q Were you at any other locations other than Northwest  
24 Detention Center?

25 A Yeah, in California. I spent some weeks in California

1           you provided three meals a day?

2       A   Yeah.

3       Q   All right.  Were you provided clothing?

4       A   Yeah.

5       Q   Were you provided medical care whenever you needed it?

6       A   Yeah.

7       Q   Did you ever need medical care?

8       A   When I need, I go.

9       Q   Okay.

10      A   Yeah.

11      Q   And did you ever need it?

12      A   Yeah.  I was when I have the dentist.

13      Q   Okay.  So you also went and got dental care when you  
14           were at Northwest Detention Center?

15      A   Yeah.  Yeah.

16      Q   Okay.  What was wrong with your teeth?

17      A   I was having bleeding.

18      Q   Bleeding?

19      A   Yeah.

20      Q   And what did they do for you?

21      A   They give me some, you know -- some mouthwash and, you  
22           know, that's -- and they check my teeth with the  
23           machine, you know.  Try to see if something is wrong,  
24           you know.

25      Q   Did they take x-rays of your teeth?

1 A Yeah. There was a time they called me, when I have an  
2 appointment, like make me kind of, you know, check, you  
3 know. Yeah.

4 Q Were you seen by a dentist? A dentist?

5 A Yeah, a doctor.

6 Q Okay. A doctor. Okay. All right.

7 Other than -- how many times did you go to the  
8 doctor for your -- your teeth?

9 A Yeah. If -- they told me they're going to -- try to  
10 clean bottom of my teeth because they didn't clean it.  
11 They give me appointment, but before the appointment I  
12 left the detention.

13 Q Okay. So you had another appointment but you were  
14 released from --

15 A Yeah. When I release through the help of world Relief,  
16 I did it. Yeah.

17 Q Did you understand that while you were seeking asylum  
18 from the United States, that the United States held you  
19 in custody until you got asylum?

20 MR. BERGER: Objection. Calls for a legal  
21 conclusion. You can go ahead and answer.

22 BY MR. DEACON:

23 Q Do you know if ICE was holding you at Northwest  
24 Detention Center?

25 A I know that I fall in the hand of America.